BOR3
56876

JACA® CORP.

Environmental Consultants • Engineers

August 11, 1988

Mr. Christopher B. Pilla
Environmental Scientist
Region III
United States Environmental
Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: CryoChem RIFS-SAP Revision 2

Dear Mr. Pilla:

As requested in your July 12, 1988 letter, JACA Corp. is pleased to submit the revised SAP for the CryoChem RI/FS. Since we received the laboratory comments on the QAPP after your July 12, 1988 comments, we will require a few more days to complete those revisions.

As a result of our addressing your comments on the SAP, we have been able to improve the plan by incorporating most of the suggestions. There are seven comments where we believe that modifications are necessary to perform the work in a more effective manner. Those are:

1. Use a stainless steel well screen combined with PVC riser pipe for the interval not continually exposed to water.

2. Drill one corehole and not two as is specified in the Consent Order.

3. Remove bulk density, porosity, permeability and clay mineralogy from the soil analyses. The first three parameters cannot effectively be performed on cored samples since the natural integrity of the soil is disrupted. Extrapolations can be made from the particle size results to estimate the in-situ character of these parameters. Clay mineralogy determination is a very difficult process, rarely performed. Its cost versus benefit is low since clay mineralogy has a minor influence on organic solvent migration.

4. The soil probe will be cleaned out by using compressed air which will "flush" the equipment out. The PID will readily tell us whether there is any contamination before we insert the probe in

550 Pinetown Road, Fort Washington, PA. 19034 • (215) 643-5466 • Telex 846570

the ground. If the probe becomes contaminated with an oily or sticky material, it will be cleaned as will the metal soil samplers.

5. A photo ionization detector with an 11.7 e.v. lamp will be used to perform the soil vapor probe screening work. The PID has the qualitative sensitivity to indicate the presence of organic vapors. We believe this is adequate to locate areas of concern for soil samples to be tested in a laboratory under controlled conditions.

6. The temporary monitor well pumps will have dedicated safety ropes but the remainder of the equipment, coated with teflon, will be cleaned between holes. Our belief is that proper cleaning should be adequate and that we cannot substantiate the additional cost of up to 14 dedicated systems that would only be used twice and which could retain contaminants should water quality improve between sampling intervals.

7. The drain system, will be tested for leaks by a direct, low pressure method for the sump and pipe beneath the shop. The test will be similar to that used for UST. The concrete conduit leading from the building to the stream will be tested by a method that simulates the previous use being flow through the pipe. The use of smoke is not recommended because it may not be visible on the surface and may flow out leaks in the top of the pipe where the previous waste would not have escaped.

Should you have any questions regarding this revised SAP, please do not hesitate to contact us. You should receive the QAPP within a week. Thank you for your consideration of our amendments.

Very truly yours,

Albert C. Gray

ALBERT C. GRAY, Ph.D., P.E.
Vice President, Water Pollution
and Hazardous Waste Operations

ACG:dee
cc: PRP's
T. Sheenan w/SAP-2

Enclosures: (3) SAP-2